

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

Blitman Saratoga LLC,

Case No. 20-23177 (SHL)

Debtor.

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DECLARATION IN SUPPORT OF APPLICATION FOR ENTRY OF FINAL DECREE

J. Ted Donovan declares the following under penalties of perjury pursuant to 28 U.S.C. Section 1746:

1. I am an associate with the law firm of Goldberg Weprin Finkel Goldstein LLP, attorneys for Blitman Saratoga LLC (the “Debtor”). I submit this Declaration in support of the Debtor’s application for the entry of a Final Decree closing this Chapter 11 case.

2. The Debtor’s Second Revised Plan of Reorganization as modified was confirmed pursuant to Order dated November 16, 2023 (ECF No. 220). The plan was funded through exit financing which closed, and all distributions to pre-petition unsecured creditors have been made by the undersigned counsel as disbursing agent, in accordance with the terms of the confirmed plan. Certain payments due to Saratoga Lender LLC as the pre-petition secured creditor, DIP lender and provider of the exit financing are being funded through sales of lots and houses, in accordance with the terms of the confirmed plan. However, the confirmed plan has been substantially consummated as that term is defined under the Bankruptcy Code.

3. All post-confirmation reports have been filed through the first quarter of 2024, and U.S. Trustee fees have been paid through the first quarter of 2024. Any additional monies

through the closing of the case will be paid within ten (10) days of the entry of the Final Decree, following final reconciliation of the fees.

4. Predicated upon the foreclosing, the case is ready to be closed and the Debtor hereby requests entry of a Final Decree.

5. Notice of this application is being provided to the U.S. Trustee, Saratoga Lender LLC and all parties who filed requests for notices with the Clerk of the Court.

Dated: New York, New York
June 7, 2024

Goldberg Weprin Finkel Goldstein LLP
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By: /s/ J. Ted Donovan